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June 26, 2024

VIA ECF

Hon. Gabriel W. Gorenstein
United States District Court
Southern District of New York
500 Foley Square
New York, NY 10007

MEMORANDUM ENDORSED

Re: Espire Ads LLC et al v. Tapp Influencers Corp. et al (1:2021-cv-10623 c/w 2:2023-cv-01347)
Letter re extension to file new joint letter replacing ECF 138

Dear Judge Gorenstein:

This firm is counsel to Defendants Tapp Influencers Corp., Tapp Market Influencers LLC, The Blu Market Inc., The Blu Market LLC, Steven Forkosh, Brennan Kastner, And Justin Emert ("The TAPP Parties") in the above-referenced matter. We write, with Plaintiffs' consent, to respectfully request an extension of time until July 19, 2024 for both parties to confer by telephone and file a new joint letter replacing ECF 138 pursuant to the Order entered by Your Honor on May 9, 2024.

Since the parties' last letter for extension, dated June 13, 2024 (ECF 147), Defendants' counsel has been working with Defendants' prior counsel, who were retaining the parties' discovery productions in support of a purported retaining lien. However, after negotiation, prior counsel agreed to provide the missing discovery files and sent the missing files to Defendants' current counsel on June 21, 2024. Defendants' current counsel has been working daily to upload the missing discovery files, but due to their large size (over 100 GB), the files are still in the process of uploading to Counsel's file servers and discovery database. This process is expected to take several more days. As such, there hasn't been significant movement and for these reasons the parties are seeking the instant extension to comply with Your Honor's May 9 Order to update the Court on the status of the instant discovery disputes.

The parties are also seeking a sixty (60) day extension for all discovery deadlines in this matter.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

/s/ Serge Krimnus
Serge Krimnus, Esq.
Attorneys for Defendants

The deadline to file the discovery letter is extended until July 19, 2024. With respect to the request regarding other deadlines, the application is denied without prejudice for failure to list each task and the associated deadline as required by paragraph 1.E of the Court's Individual Practices.

So Ordered.



GABRIEL W. CORENSTEIN
United States Magistrate Judge

June 27, 2024